



ENGLISH HERITAGE

# PPS Planning for the Historic Environment: Historic Environment Planning Practice Guide

Living Draft - 24 July 2009

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# 1. INTRODUCTION

1. This ‘Living Draft’ of the practice guide has been prepared by English Heritage at the request of Communities and Local Government and the Department for Culture Media and Sport to support the implementation of *Planning for the Historic Environment* Planning Policy Statement 15, issued for consultation in July 2009. The purpose of this guidance is to assist local authorities in implementing the Planning Policy Statement (PPS); it does not include additional national policy or provide legal interpretation.

2. The guidance provides advice, ideas and examples of practice as well as signposts to further information that may assist planning authorities, developers and communities to manage the historic environment.

3. Comments on this text are invited during the consultation period of the PPS, to be sent to The Policy Team, English Heritage, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST, or [planning.policy@english-heritage.org.uk](mailto:planning.policy@english-heritage.org.uk).

4. When finalised, this guide will be published jointly by the Departments for Communities and Local Government and Culture, Media and Sport and English Heritage, alongside the PPS. The Department for Culture, Media and Sport are also publishing guidance to inform applications for Scheduled Monument Consent<sup>1</sup>. English Heritage provides additional information on a wide range of topics to help practitioners manage the historic environment: these are cross-referenced throughout the document.

## **Government Objectives: Planning for the Historic Environment**

5. The Government is producing a statement on its vision for the historic environment in England which will set the PPS and this document in the wider Government perspective.

6. At the heart of the PPS *Planning for the Historic Environment* are policies that protect the significance of heritage assets. A clear understanding of significance is therefore central to good decision-making.

### **Significance**

Significance in the context of planning for the historic environment is how we define the sum of the heritage values of a place. We may value a site for its architectural, historic, artistic or archaeological interest. Understanding these values is necessary to inform decisions about how to protect, enhance and enjoy the benefits of these assets.

Strictly defined, “the historic environment” is anything in our environment resulting from past human activity, but only those aspects that hold significance merit consideration here. These are called heritage assets.

Some assets hold such significance that they are designated internationally, nationally or locally (including listed buildings, scheduled monuments and conservation areas)

<sup>1</sup> [www.culture.gov.uk/images/publications/SMCguidanceNotes09\\_05.pdf](http://www.culture.gov.uk/images/publications/SMCguidanceNotes09_05.pdf)

although there are equally important assets that are not or cannot be designated. *Principles of Selection*<sup>2</sup> and its supporting documents will set out the criteria for national designation and in so doing highlight how significance is evaluated for various types of heritage asset.

In most cases establishing significance is a process of gathering information on what is already known about a place (although that information may be from diverse sources) and assessing it against a wider evidence base. Sometimes an additional expert archaeological investigation of the asset itself may yield important new evidence and increase our understanding of the past generally, as well as enhance the understanding of the significance of the asset. (See paragraph 29)

An archaeological interest in investigating an asset is itself part of the asset's significance and is worthy of protection. Where the interest exists it can make the asset, or that part of it, more sensitive to change as sometimes even a very minor intervention can harm the interests of a future archaeological investigation.

The English Heritage publication *Conservation Principles* (2008)<sup>3</sup> explores the concept of significance and its component values in more detail.

7. Better applications and decisions are likely to result when applicants and local planning authorities:

- **understand the nature of the asset.** For an extensive asset, such as an historic landscape this might be through historic characterisation<sup>4</sup>, for an historic park or garden it might be through a conservation management plan, for a burial mound it may come from simply checking the relevant Historic Environment Record (HER) and local archives;
- **understand the extent of its significance.** Many heritage assets were designed and built in a single phase but some parts may nonetheless have a lesser significance and are thus more open to change. Equally for those assets with a number of phases of interest, for example a series of extensions to a house, it will need to be established what the significance of each phase is, and whether, for example, later additions offer more scope for modification. Parts of the site may still be able to carry change if carefully planned and executed. Heritage values can include habitats and wildlife and these planning issues are addressed in PPS9;

**understand the level of significance.** Designation grades, where they exist, can help in giving an general sense of importance but this is where expert opinion is invaluable in putting the importance of the asset in a wider context. Certain asset types may be peculiar to certain parts of the country and are particularly valued because they contribute to local and regional distinctiveness. Alternatively, they may be valued because they contrast sharply with their surroundings. Many heritage assets are not designated, so an appraisal ensures their significance is understood.

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<sup>2</sup> Selection criteria are currently published in PPGs 15 and 16 but will be replaced by a new publication, *Principles of Selection*. This will be consulted upon in due course.

<sup>3</sup> All English Heritage publications mentioned in this document are downloadable from [www.english-heritage.org.uk](http://www.english-heritage.org.uk) or the guidance library of the HELM website [www.helm.org.uk/server/show/nav.19702](http://www.helm.org.uk/server/show/nav.19702).

<sup>4</sup> English Heritage produce guidance on Historic Characterisation (which includes Historic Landscape Characterisation), see [www.english-heritage.org.uk/server/show/nav.1292](http://www.english-heritage.org.uk/server/show/nav.1292).



## 2. PLAN-MAKING AND THE HISTORIC ENVIRONMENT

### (Policies HE1-6)

8. This section is aimed principally at local planning authorities and, where appropriate, other public organisations or agencies that produce historic environment planning policies and guidance.

#### **Policy HE1 Evidence base for plan making**

##### **Gathering the evidence**

9. At the heart of the evidence base will be the Historic Environment Record (HER). All local authorities have access to one of the 82 HERs covering England (information on the HERs and access to some can be found via the Heritage Gateway Project [www.heritagegateway.org.uk](http://www.heritagegateway.org.uk))<sup>5</sup>. While the HER provides the core of necessary information, there are other sources that may help develop understanding, including County Record Offices and other relevant archives.

##### **Historic Environment Records**

Historic Environment Records (HERs) are information services that provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographical area for public benefit and use<sup>6</sup>. Typically, they consist of databases linked to a Geographic Information System (GIS), together with associated reference collections and are managed by dedicated staff. HERs are unique repositories of, and signposts to, information relating to landscapes, buildings, sites and finds spanning more than 700,000 years of human endeavour. Their content complements and enriches the collections of museums, archives and local studies libraries, and underpins the work of historic environment services in local authorities (and National Park Authorities) to identify, record, protect, conserve and interpret the historic environment designation and planning decisions.

Heritage Gateway is a portal that provides cross-searchable online access to records of designated heritage assets (although it is not a replacement for direct consultation with HERs and other evidence sources), local HERs; and many other sources of historic information ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)).

10. Our understanding of the historic environment is always changing in response to the new information that is continually being generated by owners developers, researchers, planning authorities and other organisations. In collecting and collating evidence that is at an appropriate level of detail for the purposes of plan-making, planning authorities may find it useful to:

<sup>5</sup> English Heritage expects to produce guidance on this topic in the near future.

<sup>6</sup> For more information see *Historic Environment Records (HERs) Draft Guidance for Local Authorities in England*, DCMS (May 2008)



- make full use of the information contained in the relevant HER;
- remember that some asset types are not currently well-recorded. For example, the *Register of Parks and Gardens of Historic Interest* is thought to represent around two thirds of potential sites;
- consider the relevance of wider environmental data available from [www.magic.gov.uk](http://www.magic.gov.uk)<sup>7</sup> or other sources;
- compile a list of the internationally and nationally designated historic assets in their area and additionally to compile a 'local list' of heritage assets judged by objective and publicly consulted criteria to be of heritage interest. The type of assets included in such a list may be as varied as those designated at the national level. English Heritage has produced advice on the compiling and maintaining of local lists ([www.english-heritage.org.uk/heritageprotection](http://www.english-heritage.org.uk/heritageprotection));
- identify areas and/or sites where there is archaeological interest, as these can be particularly sensitive to change;
- consider how established environmental assessment methods might contribute to a better understanding of the asset in question and the wider context in which it sits. These can vary from historic characterisation at the most extensive scale, through to Village Design Statements and intensive urban surveys at a more detailed level<sup>8</sup>;
- make use of characterisation or area assessment studies<sup>9</sup> (see below) where they exist and consider the benefits of commissioning such research where it does not;
- for those areas that will have Marine Plans prepared by the Marine Management Organisation<sup>10</sup>, consider the overlap with the historic environment content of terrestrial plans for inter-tidal areas and Shoreline Management Plans.

## Using the evidence

11. The evidence base will be needed:

- for sustainability appraisals and testing the soundness for regional and local planning documents;
- to understand how areas have developed their character;
- to identify where there may be opportunities to use the historic environment to influence positive place-making and to tailor policies accordingly;
- to ensure that the historic environment resource is not inadvertently diminished by ill-informed development;

<sup>7</sup> MAGIC is a web-based interactive map to bring together information on key environmental schemes and designations. The partners in the project are the Department for Environment, Food and Rural Affairs, Communities and Local Government, Natural England, Environment Agency, Forestry Commission and English Heritage.

<sup>8</sup> Guidance on the selecting the appropriate assessment technique is available from [www.english-heritage.org.uk/understandingplace](http://www.english-heritage.org.uk/understandingplace).

<sup>9</sup> See the definition of historic characterisation in Appendix 1 of the PPS and [www.english-heritage.org.uk/characterisation](http://www.english-heritage.org.uk/characterisation). Information on more detailed area assessments, for which coverage is currently very limited, can be found at [www.english-heritage.org.uk/historicbuildingsandlandscapes](http://www.english-heritage.org.uk/historicbuildingsandlandscapes). In coastal areas historic seascape characterisation can complement the understanding of the terrestrial environment.

<sup>10</sup> Under the Marine and Coastal Access Bill, UK marine areas offshore (i.e. to 200 nautical miles or median line with adjacent states) and inshore (i.e. within the English area of the UK Territorial Sea) will have a Marine Plan prepared by the Marine Management Organisation. Defra are supporting initiatives to help deliver planning compatibility.



- to identify where heritage assets at risk exist that need to be targeted in planning or regeneration proposals;

12. It is good practice for planning authorities to share the Local Development Framework (LDF) evidence base with that of the Sustainable Community Strategy and Local Area Agreement (to ensure there are strong links between these key documents and to minimise duplication) and to consider making the data collected available in GIS form for wider use.

### **The role of English Heritage**

13. English Heritage is a statutory consultee for development plans and their sustainability appraisals. As part of that process, English Heritage is able to offer general good practice advice. Guidance notes have been produced, or are underway on core strategies and environmental assessment<sup>11</sup>.

### **Policy HE2: Regional planning approach**

14. Policy HE2 requires that the Regional Spatial Strategy (RSS) identifies the historic characteristics of the region which help reinforce regional character and cultural identity (from individual assets to extensive landscapes, townscapes, and settlement patterns).

15. In drawing up a strategy, it is good practice to consider how the historic environment makes a positive contribution to achieving sustainable development, for example through:

- heritage-based regeneration, particularly of settlements or large brown-field development sites;
- increasing tourism and leisure opportunities;
- improving the quality of life and sense of place, for example by protecting and enhancing settlement patterns whether dispersed or nucleated;
- improving environmental quality and attractiveness of streets and public areas;
- increasing the housing supply through re-use;
- providing an opportunity to re-use and adapt existing buildings rather than replacing.

These contributions are best delivered when natural and historic environment objectives are fully integrated. Innovative thinking can result in exciting schemes, such as the successful mixed use heritage-led regeneration of former industrial sites such as the Royal William Victualling Yard in Plymouth, Woolwich Arsenal and Albert Docks in Liverpool,<sup>12</sup>. These examples underline the benefits of regional-level encouragement in regeneration programmes. Where appropriate, Area Action Plans with explicit targets to improve the historic environment can help deliver such large-scale projects.

16. Information sources at a regional level that are most likely to be of assistance in defining significance include:

<sup>11</sup> These documents will be available in due course from the English Heritage website,

<sup>12</sup> Other examples can be found in English Heritage's *Constructive Conservation* (2008).



- high-level historic characterisation used as key baseline evidence, combined with landscape character assessment<sup>13</sup> to define sub-regional landscape character areas and areas of particular environmental sensitivity that are unique or threatened;
- urban characterisation or similar studies to inform the assessment of the capacity of settlements for growth or regeneration;
- other historic environment data already collected by counties, metropolitan districts, National Parks or unitary authorities in its area;
- regional historic environment strategies<sup>14</sup> where they exist;
- other commissioned research at regional level to inform the process if the evidence base is insufficient for its purposes (see paragraphs 2.21 and 2.34 of PPS11).

### **Policy HE3: Local planning approach**

17. In drawing up the local development framework, a local planning authority might consider whether:

- the quality and comprehensiveness of the available evidence base is sufficient or whether further studies could be commissioned, perhaps to cover more local areas or inform development options for particular sites;
- the plan would benefit if the proposals map showed all, or at least key, identified heritage assets for information purposes;
- to include in the narrative text the identification of the importance of the character of a place and how heritage assets create or contribute to this;
- it is necessary to include an overarching historic environment policy in the Core Strategy; or if;
- there is a case for specific area policies covering the conservation and enhancement of particular heritage assets in other documents provided they are relevant to local characteristics and do not repeat or rephrase national or regional policy.

### **Policy HE4: The historic environment and sustainable development**

18. The historic environment, as a key ingredient in sustainable development, is an important element in “ensuring a better quality of life for everyone, now and for future generations<sup>15</sup>.”

19. In order to minimise conflict between conserving its heritage assets and other planning objectives, a local planning authority might wish to:

- produce Supplementary Planning Documents to assist decision-making for minor modifications to existing heritage assets so that environmental performance is improved without compromising historic interest;

<sup>13</sup> For information on Natural England’s landscape character assessment see: [www.naturalengland.org.uk/ourwork/landscape/englands/character/default.aspx](http://www.naturalengland.org.uk/ourwork/landscape/englands/character/default.aspx)

<sup>14</sup> In the regions where they exist they are produced by the relevant regional Historic Environment Forum.

<sup>15</sup> PPS1: *Delivering Sustainable Development* paragraph 3.



- produce sustainability appraisals of heritage assets at risk to highlight trends or underlying problems so as to inform policy decisions. Such appraisals are likely to include whole life energy costs of new housing stock (both lifespan and durability), the residual-life energy costs of the existing stock, allowing for strategies to increase its thermal efficiency and the sustainability of new stock in terms of energy and materials;
- celebrate best practice, often through the Local Development Framework Annual Monitoring Review, and encourage improved standards, for example through design and conservation award schemes.

20. Advice on how heritage assets can be adapted to new technologies or materials without harming their significance is available in English Heritage's series of publications on climate change, see [www.english-heritage.org.uk/climatechange](http://www.english-heritage.org.uk/climatechange)<sup>16</sup>.

21. Local development framework policies on design might set out the authority's views on the importance of new development fitting into the historic environment that surrounds it. Development that has a good relationship with its surroundings is likely to be more sustainable in the long term. Guidance on design and historic environment is available from EH and CABE<sup>17</sup>. Local authorities are encouraged to accept well-thought-through inspirational design that solves design problems in new ways, providing a full understanding of context is demonstrated. For certain key developments, the impact on views in the historic environment and in particular historic views, may need to be evaluated<sup>18</sup>.

### **Policy HE5: Permitted development and Article 4 directions**

22. In reviewing Permitted Development rights, local authorities may benefit from considering whether the protection of the significance of heritage assets can best be maintained by the judicious use of Article 4 directions. These directions provide a means by which inappropriate alterations to unlisted buildings, parks, gardens and settings of buildings in certain areas can be controlled.<sup>19</sup> They require consent to be sought for a range of works that otherwise would be 'permitted development' and therefore not require planning permission.

23. These directions can assist in the protection of the "outstanding universal value"<sup>20</sup> of a World Heritage Site, the "character or appearance" of a conservation area, or areas rich in archaeology (either formally designated Areas of Archaeological Importance or locally identified zones of archaeological importance).

24. The authority will need to be able to demonstrate that it has identified the costs and benefits in the form of periodic reviews or appraisals of the historic environment areas or sites to establish whether they might benefit from the use of Article 4 Directions, and that it is satisfied that a direction will bring measurable historic environment benefits

<sup>16</sup> Additionally [www.climatechangeandyourhome.org.uk](http://www.climatechangeandyourhome.org.uk) has information for homeowners

<sup>17</sup> For example *Building in Context: New Development in Historic Areas* English Heritage (2001) and the *Building in context Toolkit* English Heritage (2006)

<sup>18</sup> *Seeing the History in the View*, English Heritage (2008)

<sup>19</sup> These directions are made under Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995.

<sup>20</sup> "Outstanding Universal Value" is the term used in the 1972 World Heritage Convention



without imposing a disproportionate burden on owners through sufficient engagement and consultation where appropriate<sup>21</sup>.

### **Policy HE6: Monitoring indicators**

25. Ensuring effective delivery is fundamental to the process of producing plans. Authorities will find that plans with clear historic environment objectives, targets and performance indicators will deliver more effective outcomes. Local authorities might usefully seek ways of measuring how changes, positive and negative, to the historic environment compare to economic and social changes, particularly in those settlements and/or areas undergoing change either through regeneration or growth.

26. Heritage at risk information<sup>22</sup> is one good way of assessing whether their protection policies are achieving success, allowing LPAs to use trend data to assess whether their historic environment policies are helping to reduce the amount of designated heritage at risk. Where appropriate and available, data can then be included in the annual review of the LDF.

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<sup>21</sup> More advice on these directions is available in the English Heritage publication *Article 4 Directions* (July 2009).

<sup>22</sup> More than 2/3rds of local authorities have collected at least some Heritage At Risk data. Information on Heritage At Risk initiative can be viewed at [www.english-heritage.org.uk/heritageatrisk](http://www.english-heritage.org.uk/heritageatrisk). Local and national 'at risk' information will be of assistance.



### 3. THE DEVELOPMENT MANAGEMENT PROCESS

#### (Policies HE7-13)

27. Section 3 gives generic guidance on decision-making when faced with a planning or other consent application<sup>23</sup> for development that affects the historic environment. More detailed advice on change to specific aspects of the historic environment follows in Section 4.

#### ***POLICY HE7: Pre-application discussions and assessment***

28. Pre-application discussions can create a shared understanding between the local planning authority and the applicant of the significance of any heritage assets that may be affected by proposed development. Heritage assets may be affected by direct physical alteration, or disturbance, or by change in their setting. Pre-application discussion makes it more likely that:

- conflicts between historic environment conservation and other planning considerations will be avoided;
- opportunities to enhance the significance of the asset will be taken; and,
- the application will be approved.

#### **Establishing significance before a proposal is designed**

29. To establish the significance of affected heritage assets, applicants are advised to:

- start with an examination of the main national and local records including Heritage Gateway, local HERs; and many other sources of historic information;
- make sure they examine both the asset itself and its setting;
- consider whether the nature of the significance affected means that an expert assessment may be necessary to achieve the necessary level of understanding;
- consult the relevant archaeological and built conservation specialists at the planning authority to discuss appropriate levels of investigation;
- consider whether there are any specialist procedures that need to be employed because of the type of asset, for example for archaeological remains underwater or historic parks and gardens;
- where there is possible archaeological interest in the asset, consider and seek advice on the best means of assessing the nature and extent of that interest. Where there might be buried remains, techniques such as geophysical survey and limited excavation may be needed;
- consider whether certain buildings may require physical intervention (e.g. by removal of plaster) to enable analysis of important aspects of the building that may be hidden behind later additions and alterations;
- carry out additional assessment where the applicant's own research or discussions with the local planning authority have established archaeological or

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<sup>23</sup> Including listed building consent and conservation area consent.

historic interest. That further assessment will at least require a desk-based assessment and may require an on-site evaluation<sup>24</sup>;

- consider whether investigative works may themselves require consent;
- use this information as part of the evidence base for the design and access statement that should evolve through the whole process of developing the proposals into an application.

**Desk-based assessment:** The applicant may be requested to supply a desk-based assessment of what is known about the site and the area in which it lies. The assessment is of existing information, such as: the main national and local records; topographic, cartographic, and other historical sources; site-specific information such as soil engineers' ground conditions and contamination reports; and, existing and proposed site plans<sup>26</sup>. The aim is to assemble the best information as to what historic interest there may be in the site and therefore how best an archaeological investigation may be planned.

**On-site evaluation:** Where a desk-based assessment indicates archaeological interest in the site (whether below-ground or in buildings and other structures) that might be affected by development, it may be necessary to take a further step and establish the presence, extent and importance of that archaeological interest through on-site evaluation. This may be achieved through a number of techniques, with varying degrees of ground or structural intrusion. These include trial-trenching, test-pitting, field-walking, remote-sensing, geo-archaeological borehole investigation, opening up and CCTV. Local authority archaeology advisors can provide guidance on standards and practices pertinent to their areas. A full list of archaeology advisors, provided by the Association of Local Government Archaeological Officers, can be found at: [www.algao.org.uk/Association/Members.htm](http://www.algao.org.uk/Association/Members.htm). There are other specialists covering particular types of asset such as parks and gardens or landscapes.

## Heritage Partnership Agreements

30. At the pre-application stage it is worth considering whether both the owner and local planning authority might benefit from developing a heritage partnership agreement as they can aid negotiations and reduce administration. In such an agreement the parties set out, amongst other things, their shared understanding of the significance of the heritage asset or assets<sup>27</sup>. Such agreements can particularly help by establishing at the outset what is not of special interest in listed buildings (i.e. those parts that can be altered without detriment to the significance) and thus reduce the number of occasions when consent is required. Reaching an agreed, and fuller, understanding of significance will reduce areas of doubt or confusion and therefore increase the prospect of success for a consent application where it is still required. It can also help inform the scope of planning application considerations. It is particularly recommended for large or complex designated heritage assets and estates or heritage assets of the same type in dispersed locations.

<sup>24</sup> Note that assessment and evaluation may be necessary for buildings and areas where understanding of history and significance is incomplete.

<sup>26</sup> See, for example, *Parks and Gardens; A researcher's guide to documentary sources for designed landscapes* Landscape Design Trust 2006.

<sup>27</sup> English Heritage expects to produce guidance on this topic in the near future.



## ***POLICY HE8: Information requirements for validation of applications for consent affecting the historic environment***

31. Annex A of CLG Circular 02/2008 *Standard Application Form and Validation* contains details of the information that must accompany applications for planning permission, conservation area consent and listed building consent. The amount of analysis and detail required will vary according to the nature of the application and the assets affected. For example, for a major repair and refurbishment programme it is reasonable to expect the applicant to provide detailed information on the asset as a whole and an explanation of the impacts. An application for a minor alteration to part of the asset is likely only to require detailed information on the affected part of the asset, along with a brief explanation of how the impacts relate to the significance of the asset as a whole<sup>28</sup>. Where a Design and Access Statement is required to support the planning application, it will need to include this information, and use it to justify the design approach.

## ***POLICIES HE9 and HE10: Policy principles guiding the consideration of applications for development relating to designated and undesignated heritage assets***

32. Assessing proposals against policy HE9 and (for designated assets or equivalent) HE10, is essentially a five-stage process:

- Identifying the heritage assets affected;
- Understanding their significance;
- Assessing the impact of the proposals on that significance;
- Resolving or minimising conflicts;
- Weighing-up the proposals.

### **Identifying the heritage assets affected**

33. The fabric of some heritage assets may be directly physically affected by development proposals and these are easily identified. Others may be affected by development within their setting. Effects on setting may be limited to heritage assets within the boundary of the proposed development and its immediate surroundings, but can extend to a far wider area. In the case of large or particularly prominent development, such as a high rise building, affected assets may be a considerable distance away. There are a number of visual assessment tools that might be of assistance in ensuring transparent and consistent decision-making<sup>29</sup> and English Heritage is producing guidance on setting (see para 55).

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<sup>28</sup> Advice on what English Heritage might require when considering an application is available in *A Charter for English Heritage Planning and Development Advisory Services* English Heritage (2009)

<sup>29</sup> Examples of visual assessment tools include Placecheck, Visual Impact Assessment, Accurate Visual Representation, *Seeing the History in the View* and other 'visioning' techniques, including those promoted by the Landscape Institute.



## Understanding their significance

34. It is best practice for an applicant to identify significance to a necessary degree before commencing the design of new development. Paragraph 29 sets out the steps that applicants may take to achieve that understanding. The significance of affected assets can then be documented and provided with the application. If an application is validated but is later found to be deficient in the depth or extent of the description of significance, local planning authorities can require that more information be provided<sup>30</sup>. They can also consult their own sources of expert advice and information.

35. The values that a place holds for some communities may not be obvious from expert advice or research alone. Where the local planning authority thinks there may be for example historic associative or commemorative value of a place to a particularly community, it is good practice for it to consult interested parties who may have views and information that would add to the understanding of the asset's significance. Consultation might be with local historical and civic societies as well as any groups of individuals with links to the site and its past and, where one exists, the local Conservation Area Advisory Committee<sup>31</sup>

## Assessing the impact of the proposals on that significance

35. If the understanding of significance is sufficient then the impact of the proposals on that significance ought to be clear. A proposal may harm or enhance the significance of a heritage asset or it may be neutral. It may have a combination of those effects. Detailed guidance on the impact of works on the significance of some common heritage assets is contained in Section 4.

## Resolving or minimising conflicts

36. After carrying out the assessment of significance and the impact of the proposal on it, local planning authorities are encouraged discuss the findings with the applicant to minimise the chances of a proposal being rejected. These discussions might include:

- whether conflicts between conservation and the applicant's aspirations for the site can be avoided or minimised;
- whether such development may be better used to enhance the significance, of the asset and to secure its long-term conservation;
- how mitigating the effects of climate change and moving towards a zero-carbon economy might be best achieved. There are likely to be a variety of means available to improve the energy performance and resilience of heritage assets that are reasonable and practically possible without adversely affecting the character of the asset or increasing the risk of its long term deterioration<sup>32</sup>. Before any competing climate change and historic environment planning aims are weighed-up, it is advisable to explore whether

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<sup>30</sup> See [www.opsi.gov.uk/si/si1995/Uksi\\_19950419\\_en\\_1.htm](http://www.opsi.gov.uk/si/si1995/Uksi_19950419_en_1.htm)

<sup>31</sup> The local authority can advise on the existence of Conservation or Design advisory committees or panels. They offer informal advice to the local authority on policy and casework matters.

<sup>32</sup> For information on building regulations, particularly the forthcoming revisions to Part L, see [www.communities.gov.uk](http://www.communities.gov.uk). Advice is also given in *Building Regulations and Historic Buildings* English Heritage (2004)



adopting a different approach can achieve the same benefits for climate change as cost effectively without compromise to the historic environment (HE 9.5). This could include looking at using different technologies altogether or through design mitigation of the impact; and,

- the setting of conditions for the granting of consent will help resolve any outstanding issues.

37. Sites containing, or suspected of containing, archaeological interest can be particularly sensitive to use or development as sometimes even the most modest of intrusions can damage the interests of a future investigation into the site's historic interest. In such cases the applicant and local planning authority are encouraged to:

- properly understand the nature and physical extent of the archaeological interest in these sites including through a desk-based assessment or field evaluation, if required;
- look for proposed uses that are benign to the conservation of the archaeological interest;
- seek to eradicate or minimise impact through design (for example, foundations that span sensitive areas rather than penetrate them).

## **Weighing-up the proposals**

### ***Benefits***

38. There are a number of benefits that the development may deliver that would weigh its favour:

- secures the longer term conservation of heritage assets (policy HE9.4);
- enhances the significance of heritage assets (policy HE9.4)
- utilises the positive role of heritage assets in place-making (policy HE9.4);
- is an appropriate design for their context and making a positive contribution to the character, quality and local distinctiveness of the historic environment (policy HE9.6);
- is a use that is consistent with the conservation of any heritage asset or its setting (policy HE9.6).

### ***Loss of significance***

39. Significance of heritage assets ought not to be lost without a public benefit justification (HE 9.7, HE 9.8, HE 10.1, HE 10.2 and HE 10.3). Given that loss of significance is generally irreversible, where the decision is finely balanced the Policy HE 9.7 requires a presumption in favour of retention. The loss of significance cannot be quantified precisely, but will vary in degree along a sliding scale. It is the degree of loss of significance that needs to be weighed against the public benefits (HE9.7).

40. In any event, the policies require that no material harm to or removal of significance of a heritage asset by alteration or destruction can be contemplated unless one of the threshold tests in paragraphs a, b or c of policy HE9.8 are passed. Even then, the merits of the proposal have to be weighed, in the usual way against the loss of significance. This means it is unlikely that the most significant assets will ever be justifiably destroyed in favour of development.



### ***Alterations to allow a change of use***

41. If the asset is capable of use, the original use of the asset is generally most likely to lead to its satisfactory conservation because loss of important fabric will usually not occur. Minor loss of significance in order to maintain the original use may well be justified. If a proposal is put forward for an alternative use on the grounds that the original use of the asset is no longer possible and that the new use will secure the future of the asset by providing for its maintenance, a local planning authority is advised to consider whether the new use:

- is demonstrably sustainable in the long term;
- involves the minimum loss of significance compared with other possible sustainable uses;
- minimises the pressure for future change to the asset;
- minimises wear and tear effects.

42. An asset may be capable of use in theory, but be so important and sensitive to change that alterations to accommodate a change of use would lead to an unacceptable loss of significance.

### ***Demolition or destruction***

43. Where land simply cannot be developed at all because of the presence of a heritage asset then a case may be made for its destruction or removal to allow development, although the asset still may be too important to lose (HE 9.8b and HE 10.3). This will, though, be a rare occurrence. The great majority of heritage assets can be put to their original use or, with imagination, some other use that secures their long-term conservation. There are assets that are obviously not “usable” in themselves, such as standing monuments or areas of buried remains, but it is rare that these prevent use of the site altogether as there are usually ways in which the impact of changes can be avoided or minimised, for example by adapting the footprint of new development or modifying land use regimes.

44. If the presence of the heritage asset prevents all reasonable uses of the land, the local planning authority can consider whether the asset itself has a viable future and if it does not, whether removing such an impediment to development outweighs the loss of the significance of the asset. Given the irreversibility of any such decision, policy HE9.9 requires that every effort is made to find a future for the asset. The fact that the applicant or its advisers cannot conceive of a viable use for the asset does not mean that there is no such use. Others may be able to find uses. For designated assets there is specific policy requirement that the property be marketed to ensure third parties are given the opportunity to take on the asset (policy HE10.3).

### ***Marketing as part of a case for demolition.***

45. The purpose of marketing (as required in Policy HE10.3) is to reach all potential buyers who may have the imagination and determination to find a use for the site that still provides for its conservation to some degree. To ensure that those marketing efforts have been genuine and given the best chance of succeeding, local authorities may



consider the following aspects of the marketing, amongst others, in order to judge its merits:

- **The timing of the marketing.** The policy requires that there is clear evidence that no viable use can be found in the “medium term”. When there are poor market conditions consideration may be given to delaying marketing until the general conditions have improved to the point where general market sentiment can be distinguished from interest in the asset;
- **The period and means of marketing** to best reach all categories of potential purchaser;
- **The asking price.** A price that does not fairly reflect the true value of the heritage asset will deter inquiries;
- **Condition of the site and deliberate neglect.** The condition of the site should be reflected in the asking price. Deterioration from deliberate neglect of the asset in the hope of obtaining consent is to be ignored. If the cost of making-good the deterioration from deliberate neglect is greater than any value the site may have had without the neglect it may not be possible for the applicant to positively prove that the asset would not have been viable in the assumed condition that policy H9.9 requires;
- **Land included and nature of the interest** being marketed.

#### ***Other third party interest and support for assets under threat***

46. In addition to finding a future for a site through marketing, public sector and charitable assistance in conservation needs to be considered (HE 9.8). Where the asset is designated, the applicant is required particularly to show that reasonable endeavours have been made to find a public or charitable owner or grant-funding that may pay for the asset’s continued conservation. Among those who the applicant might have been expected to have approached are the local authority, national and local preservation trusts and civic and amenity societies.

#### ***Condition of the asset and deliberate neglect***

47. The local planning authority will often need to take into account the condition of the asset in its decisions. A dilapidated asset is less viable than one in good repair as the cost of repair will be incurred before it can be used. An asset may deteriorate so far that a once sustainable use is no longer viable. It is appropriate to take the condition into account except where it has been caused by deliberate neglect in the hope of obtaining consent (HE9.9). Whilst there is no positive responsibility on owners to maintain heritage assets, it would be wrong to disadvantage those who maintain their assets in good faith.

#### ***Loss of significance and conditions***

48. Where a proposal is thought acceptable because of a public benefit brought by the scheme, or perhaps because of mitigation of the impact, it is appropriate for the local planning authority to apply conditions or require a planning agreement in order to ensure that the loss of significance does not occur unless and until that public benefit is secured (policy HE9.10).



## ***POLICY HE11: Additional policy principles guiding the consideration of applications for development affecting the setting of a heritage asset***

### **Defining the setting and understanding its importance**

49. All heritage assets have a setting and this can make an important contribution to the significance of the heritage asset and the ability to appreciate that significance. It can also detract from it or be neutral.

50. The contribution made by setting to the significance of a heritage asset does not depend on whether it was designed specifically to complement the heritage asset (such as formal parkland around an historic house) or whether it has developed fortuitously (such as a multi-period townscape around a medieval church). Nor does it depend on the public's right or ability to gain access to that setting.

51. The setting of a heritage asset includes any parts of the asset's surroundings that have a relationship with it capable of affecting either its significance or people's ability to appreciate its significance. The extent of setting is not, therefore, fixed and will change as a heritage asset and its surroundings evolve.

52. Setting includes, but is not restricted to, visual relationships and will normally be more extensive than curtilage. For example, buildings that are close by but not visible from each other may have a historic or aesthetic connection that amplifies the significance of each. This can apply to buildings or sites that currently share or used to share a function or purpose as well as those that were designed or built together.

53. The ability to appreciate significance can be harmed, improved or left unaffected by changes in the setting. Again, this is perhaps most likely to be through the addition or removal of permanent visual intrusion, but noise and general activity, from traffic, for example, can have an impact. The ability to appreciate an asset can actually be part of its significance. Some buildings, townscapes and landscapes were designed to give a particular impression from certain viewpoints and loss or impairment of these can diminish that value.

### **Assessing the impact of change within a setting**

54. Change within the setting of a heritage asset can enhance as well as reduce the asset's significance and the ability to appreciate its values but it can also leave it unaffected. Understanding the values the asset holds and therefore its overall significance will enable an understanding of the contribution that the setting makes to significance and the ability to appreciate it. The effect on the significance of development within the setting can then be considered and weighed-up following the same principles as apply to impact on significance through physical intervention in the asset (see Policies HE9, 10 and 11).

55. More detailed guidance on defining and understanding the setting of heritage assets and evaluating the impact of any changes within will be provided by *The Setting of Historic Assets: English Heritage guidance*<sup>33</sup>

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<sup>33</sup> Consultation draft will be issued later in 2009.

***POLICY HE12: Additional policy principles guiding development of a heritage asset that is otherwise contrary to the development plan (also known as enabling development)***

56. The key public benefit to heritage assets of allowing enabling development is usually securing their long-term future when the opportunity for passive conservation or development in compliance with policy cannot do so. Detailed guidance on how the applicant might make an enabling development application and on how a local planning authority can ensure the policy requirements are fully tested, is set out in English Heritage's document *Enabling Development and the Conservation of Significant Places* (2001).

***POLICY HE13: Policy principles guiding the recording of information related to the historic environment.***

57. A lot of historic environment information is already accessible through the local HER and other public sources, such as published texts, libraries, and museums. The role of HERs is explained in more detail at paragraph 9. There is essentially no limit to the amount of valuable knowledge still to be gained from the historic environment. Keeping this new knowledge and making it widely accessible is a recognised public good.

58. Many heritage assets have the potential to yield new evidence about past human activity through archaeological investigation. Although we may learn a lot from an investigation undertaken today, the knowledge is not a substitute for the heritage asset itself. Records cannot deliver the sensory experience and understanding of context provided by the original heritage asset. Records also reflect the outlook, technical capabilities and circumstances that prevailed at the time they were made. Techniques and understanding are always improving, so future investigations may ask different questions, employ alternative approaches and lead to greater understanding. For this reason, the best sources of information and understanding of our past are always the heritage assets themselves and the ability to investigate and record a heritage asset is not a factor in deciding whether consent for its destruction should be given (policy HE13.1).

59. Where development will lead to some loss, policy 13.3 requires that local planning authorities ensure that developers fully utilise the opportunity to advance our understanding of the past before the asset or the relevant part is lost forever. As there is only one opportunity to do this it is important that:

- any investigation is carried out to a high standard and to an appropriate level of detail;
- the results are properly recorded; and
- the understanding gained is made publicly available.

The steps to be taken by the developer to achieve these aims can be controlled through a written scheme of investigation. The planning authority can provide a brief, prepared by their archaeological adviser, as to what they expect the scheme to cover. Conditions



can then be applied to the consent or a planning agreement entered into, as appropriate, to ensure that the developer cannot take the benefit of the consent without fulfilling the obligation to recover understanding, as required by the policy<sup>34</sup>. An appropriate expert adviser to the developer will usually then draft the scheme and submit it to the local authority to comply with the condition.

A **Written Scheme of Investigation**, which sets out a number of stages to follow in order to fulfil the planning obligation, is likely to include:

- information from existing documentary sources
- site investigation prior to development commencing (particularly for excavation) and/or investigation in co-ordination with site works (such as analysis of building fabric revealed as stripping out or demolition is underway);
- post-investigation assessment of the results, with proposals from the investigating expert for an appropriate level of publication and dissemination of the results dependent on what is found;
- the preparation and publication of a suitable report on the advancement in understanding that the results bring;
- the submission of a report to the HER summarising the investigation and how it has been disseminated;
- the offer of deposition of the site records, including drawings, photographs, surveys, artefacts and samples, to an appropriate archive, museum or other depository;
- recording understanding of what is known of the heritage asset before the investigation started;
- wildlife considerations that may have heritage implications, such as bat surveys;
- research questions being asked of the heritage asset, in relation to regional and national research frameworks<sup>35</sup>;
- methods by which the requirements of the brief will be met;
- integration of the results of the site investigation with any pre-decision-making investigation;
- a requirement to comply with professional standards of recording, to ensure the quality and consistency of records;
- the experience and expertise of the investigating body;
- proposals to communicate the results of the investigation to the local community, and seek their engagement; and,
- an indicative timetable in which each of the stages will be completed.

60. It is advisable for a local planning authority to satisfy itself that the written scheme of investigation is proportionate, satisfactory and appropriate to the significance of the asset being investigated and analysed before approving its implementation as part of a consent<sup>36</sup>.

<sup>34</sup> See paragraph 65

<sup>35</sup> See [www.english-heritage.org.uk/research](http://www.english-heritage.org.uk/research).

<sup>36</sup> Further guidance on how to prepare a written scheme and ensure its objectives are met is available in the English Heritage publication *Management of Research Projects in the Historic Environment* (2006).



## Reporting, Publication and Archiving

61. Where a local planning authority has required the completion and publication of a report detailing the findings of the investigation the most positive outcome is likely to be achieved if:

- the best means of publication to reach target audiences, dependent upon the nature of the findings, has been identified;
- the written scheme has left the investigating expert to propose an appropriate form of publication once the investigation is complete;
- dissemination of the report to both the general public and expert groups has been considered. For important sites, full publication of all necessary detail to an appropriate level will normally take place in books and archaeological, architectural or historical journals, with a local or national audience. Other forms of dissemination, particularly through the web, may also be used;
- the structure, length and detail of the report has been agreed beforehand<sup>37</sup>. Not all proposals will require investigation and where they do, the amount of work involved will be proportionate to the significance that will be lost through the development.

62. Deposition of copies of reports and site summaries with the HER is vital in providing an evidence base that can be called on for future plan- and decision-making by planners and applicants.

63. Securing the archive of an investigation, which may include written records, measured drawings, photographs, artefacts, samples, and environmental evidence, will enable future study. New techniques may be developed that can be applied to old discoveries. Advances in science, such as DNA analysis, can throw a new light on the past. The archive can be offered to a suitable repository, such as a museum, county archive service, or an expert institution who may be very willing to take it. It is best practice to consult the repository at the earliest stage.

## Public Engagement

64. The process of investigation and recording, such as dismantling a building, or excavating a site, may be of public interest in its own right. Where appropriate and possible, local planning authorities may wish to consider the public benefit of making the investigative works open and interpreted to the public and requiring that as part of the written scheme of investigation. For example, this dissemination could include viewing platforms and interpretation panels as well as seeking coverage in the local newspaper.

## Conditions and Planning Agreements

65. The performance of the written scheme of investigation follows the granting of consent and will normally be secured through a condition of the consent, or by a separate Section106 planning agreement. The key considerations are likely to be:

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<sup>37</sup> A suggested contents list is set out in the English Heritage publication *Understanding Historic Buildings: Policy and Guidance for Local Planning Authorities* (2008).

- the importance of relating the obligations to a finalised written scheme of investigation. A condition requiring later agreement of the written scheme can leave both the applicant and planning authority with unnecessary difficulties if they cannot reach that later agreement. The applicant will want to know the extent of its commitment before implementation of the consent;
- the sequence of events for the investigation and recording, ensuring they take place at the right time in order to properly and confidently plan the development and reap the best results;
- how to secure the quality of the final report, for example, by stipulating particular expertise or a particular expert is employed in carrying the scheme through;
- whether it is appropriate to require completion of some or all parts of the scheme by Grampian condition such as a requirement that no development take place or may not be beneficially occupied until investigation is complete. If not enforcement may be best safeguarded by use of a Section 106 planning agreement.

### **New discoveries during work**

66. When, during development, a new discovery arises that could not reasonably have been foreseen at the time of application, the local planning authority is advised to work with the applicant to negotiate a solution which protects the significance of the new discovery, so far as is practical within the scheme. The importance of the discovery will have a bearing on the extent to which the local authority wishes to require modifications to the proposals. The new evidence may cause the local authority to consider reviewing the decision. English Heritage would wish to be informed if the discoveries are likely to merit designation.



## 4. FURTHER GUIDANCE ON MAKING CHANGES TO HERITAGE ASSETS

### *Introduction*

67. The following section illustrates the application of the principles of PPS 15 to some common circumstances that arise in applications for planning permission and the various heritage consents. The examples are generalised and are not a substitute for the process of understanding the particular significance of the affected assets and the impact upon that significance in each case.

68. It may also assist local planning authorities and applicants in determining whether listed building consent is required for works as that consent is only required for works that affect the special interest in a listed building. It should be noted, however that the requirement for scheduled monument consent is on a different basis<sup>38</sup>.

69. Where change is proposed to a heritage asset, it can usually be characterised as one or more of:

- **Repair and restoration** – works to maintain a property or to return it to a known former state;
- **Addition and alteration** – work for the purposes of adding to or changing the function or appearance of an asset;
- **Works for research alone** – not linked to other changes.

70. These three types of work or intervention are each considered for each of six broad categories of heritage asset (although some assets straddle more than one category):

- **landscapes** - both extensive and smaller scale, including, but not limited to, designed and ornamental or recreational landscapes or battlefields;
- **buildings and structures**;
- **standing remains** - normally the ruined remains of buildings, structures or landforms such as earthworks. Sometimes these may be hidden within later structures of no significance themselves;
- **buried remains** – fragmented evidence of past human activity, for example remains of structures and other material, including evidence of past environmental change which are not visible without works of excavation or opening-up. Buried or concealed remains may survive beneath or within other assets and they may be affected by works to that asset;
- **groups of, or very large, heritage assets** - e.g. conservation areas or clusters of scheduled monuments where the whole is greater than the sum of the parts;
- **marine sites** - (including landscapes now submerged) in rivers, estuaries and coastal areas to the low-water mark.

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<sup>38</sup> For information specifically on scheduled monuments, see *Guidance on Scheduled Monument Consent*, DCMS (2009): [www.culture.gov.uk/images/publications/SMCguidanceNotes09\\_05.pdf](http://www.culture.gov.uk/images/publications/SMCguidanceNotes09_05.pdf)



## ***Repair and Restoration***

### **General Points**

71. Minor repair, as opposed to wholesale rebuilding or renewal, is very unlikely to require planning permission. If the heritage asset is a listed building, minor repair will not need listed building consent if it does not affect the special interest. Upgrading of bathrooms, fitted kitchens etc will not normally affect the special interest. Whether the repair affects the special interest will usually be dependent on the degree to which the repair can be carried out using the same materials as the original construction; the degree of visual impact (if any); and, whether there is any archaeological interest in that part of the asset.

72. Restoration to a listed building is likely to require listed building consent and may require planning permission.

73. Good conservation of heritage places is founded on appropriate routine management and maintenance. For many types of heritage asset, this low level, regular work will ensure that larger repairs or other interventions are not needed for many years and is therefore strongly encouraged for all owners. It is almost always the most economical way of maintaining an asset and in the best interests of its conservation.

74. Repairs will normally be low-key re-instatement or strengthening or the introduction of new elements to support or protect the asset. These works will usually be the minimum necessary to stabilise the situation for the medium to long term.

75. Repairing and re-using materials to match the originals is strongly encouraged; it helps maintain authenticity, it ensures the repair is technically and visually compatible; it minimises the use of new resources and reduces waste. Original materials normally only need be removed when they are beyond repair and are incapable of re-use.

76. It will usually be best practice to carry out repairs using traditional materials and methods, for example splicing in new timber to enable a larger piece of historic timber to remain. However, alternative approaches may be appropriate if the technique is proven not to cause long-term damage to the asset and if they result in less overall loss of original fabric, for example a hidden stainless steel strengthening element to allow a failing arch to remain in situ.

77. Restoration may include small-scale work to re-instate missing elements of decoration, such as the reinstatement of a chimney to a known but no longer extant design, through to large schemes to reinstate the former appearance of buildings with the addition of major missing elements or the replication of an earlier facade.

78. Factors to consider when looking at the merit of restoration include:

- whether the current significance of the asset will be harmed by the restoration
  - historic significance may be obscured if the element being restored was lost through some historically significant event or if the restoration favours a particular period in the evolution of the asset over other significant periods;



- archaeological interest may be corrupted if the restoration work could later be confused with the original fabric;
- the degree to which the significance of the asset will be enhanced by the restoration;
- the relative significances of the pre- and post-restoration building;
- whether the proposed work is justified on compelling evidence and is to be executed in accordance with that evidence.

79. For **landscapes**, repair will generally be part of ongoing stewardship of the land. In parks and gardens maintenance is essential to keep the fabric in good order and to conserve the original fabric and design intentions. A break in maintenance may lead to premature failure of elements and necessitate repairs or sometimes restoration. Accurate repair following decay is likely to be justified as a means of perpetuating the design if there is sufficient information of the design to inform the repair and if the materials (trees, plants or other materials) and the techniques are close and high quality matches. For battlefields, which are generally managed agricultural land, repair is likely to be small-scale interventions e.g. maintaining walls, hedges or fences.

80. Restoration is not unusual in historic parks and gardens as even where maintenance has been continuous the original intentions may have been departed from. Restoration in parks and gardens usually involves putting the designed landscape back in good order to an earlier known state determined through research and conservation management planning.

81. The evidential and associative value of historic battlefields will usually be reliant on the ability to appreciate the location and topography of the site and its wider setting. Restoration may involve removing later additions to the site. For any development, the sensitivity of any archaeological interest in the site will need to be considered.

82. For **buildings** and other structures repair will usually best carried out using materials of a texture, quality and colour that give the asset its significance. Care will be needed to ensure that repairs to walls through rendering, painting or re-facing do not obscure valued original surfaces. Some repair techniques may have a deleterious effect on the integrity of the existing building, such as the use of cement-based mortars in place of softer lime. This may cause permanent damage to the historic fabric as well as being visually unsympathetic. Repointing of historic mortar will normally leave the significance unaffected, provided it copies the original mix and appearance. Elements of buildings, such as doors and windows, are frequently key to its significance. Where this is the case, repairs that modify them in ways that damage that interest are very unlikely to be acceptable. Where it is proposed to repair a building by replacing whole elements, such as a roof, windows and doors, there is a greater risk of impact on significance. So it is advisable to ensure that the renewal is technically necessary and minimises the loss of historic fabric, as repair of such elements may be more sustainable and appropriate in many cases. The threat to elements of a building from such things as timber decay can often be minimised by dealing with the cause of the decay rather than treating the symptoms but where remedial works do prove necessary, minimum interference to achieve reasonably long-term stability is usually the best approach for conservation sustainability.

83. Restoration involving the stripping-off of later layers of work or abrasive cleaning is only likely to be acceptable where it can be shown that



- the later layers are not of significance in themselves;
- they are damaging the original and most significant fabric; and/or,
- by their removal there would be an enhancement to the significance of the original building that outweighs the loss of the later addition.

84. The stripping-off of finishes such as plaster to expose rubble, brick or timber-framed walls that were never intended to be seen is likely to have an adverse effect on the building's significance through the loss of historic materials and original finishes and harm to the aesthetic. Where it is proposed to remove more modern coverings that are harmful to the significance or deleterious to the integrity of the building, appropriate materials will need to be re-introduced carefully to ensure an authentic and/or suitably detailed finish is achieved, for example mock jointing, or rustication, where there is evidence of the original intended finish. If there is any doubt as to the authentic finish, it is better to err on the side of caution and create a simple finish rather than one with speculative decoration. Sometimes early framing or finishes were covered up because they were in a poor state and an unacceptable amount of loss of original fabric may result from works to make the earlier surface visually acceptable.

85. Many building types have much published information on appropriate restoration techniques. Timber-framed buildings, for example, have been well-researched and appropriate conservation approaches have been shown to work very well while minimising loss of original fabric and structural integrity. It is important not to forget that secondary elements, such as the infilling of timber frames, are of value too and their retention will ensure that the integrity of the whole building is achieved. The reuse of as much of the original materials, for example on historic roofs, or in window or door restoration, is encouraged for conservation as well as more general sustainable development reasons.

86. The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases and features are likely to form part of its significance. Proposals to remove or modify internal arrangements, including the insertion of new openings will be subject to the same considerations of impact on significance (here likely to be its architectural interest) as for externally visible alterations.

87. Small-scale features, such as historic painting schemes, carpenters' marks in timber, chimney stacks, inscriptions and signs will frequently contribute strongly to a building's significance and their loss or moving or obscuring them would require justification.

88. New services, both internal and external can have a considerable effect on the appearance of a building, and can affect significance through their physical intrusion. The impact of necessary services can be minimised by avoiding damage to decorative features and the use of materials appropriate to the asset's period, such as cast iron for gutters and down-pipes for Georgian and Victorian buildings.

89. Replacement of one material by another, for example on roofs, is likely to result in a loss of significance and will in those cases need strong justification. This includes changes from one type of thatch, slate or tile to another. For thatch, for example, preserving the covering on multi-layered roofs, particularly where the bottom layer is smoke blackened, is likely to be necessary in order to maintain the historic and



archaeological significance of the building. The new top coat may be repaired in a type and form of thatch traditional to the region with local ways of detailing eaves, ridges and verges being followed<sup>39</sup>.

90. **Standing remains** are likely to have very high historic and archaeological significance. To maintain that significance, particularly given the sensitivity of an archaeological interest, acceptable repairs are likely to be the minimum needed to keep the structure or feature as close to its current state as possible. The addition of small and visually unobtrusive elements will sometimes help to give longer term protection, such as the soft capping of walls with turf or the introduction of sacrificial elements, such as a shelter coat of limewash or lead flashings, that will take most of the weathering and can be replaced relatively regularly without affecting the earlier elements.

91. A justified case for restoration of standing remains will be a much less frequent occurrence than it would be for buildings. Where there is compelling evidence of the former state of the structure and there are demonstrable benefits to the significance in restoring, as opposed to repairing, the standing remains a proposal may be acceptable. However, the merits will have to be weighed against any harm caused, particularly to the archaeological interest.

92. Where a case is made for bringing a ruined structure back into use through a large degree of restoration, the local authority will need to carefully balance the long term benefits to the sustainability of the asset with the impact on significance through the direct damage to the fabric.

93. For earthworks, restoration of elements to assist with its ongoing management, such as infilling gaps in earth mounds or dealing with the effects of burrowing animals may well be justified where there are demonstrable benefits to the long term conservation of the asset.

94. **Buried remains** are unlikely to require repair as part of their management, but care will be needed with more general management regimes (such as drainage) to see that they are not inadvertently causing damage to the significance of the asset (particularly its archaeological interest).

95. It is difficult to conceive that restoration from buried remains would accord with the general principles. If the remains still form a structure (perhaps in the form of foundations) work to remove the soil overburden may be justified but the case will need to be strong to balance the likely threat to both the sustainability of the asset and its archaeological interest arising from exposing remains. Leaving the site undisturbed is usually the preferred solution. Where the primary aim of any works to expose the remains or restore them is to illustrate the past or educate, it may be preferable to recreate the feature away from the authentic remains.

96. **Large assets**, like parks and gardens, conservation areas and World Heritage Sites, can suffer from an inconsistency of approach to repair and restoration over time. This may be through different attitudes being taken to decisions, or through differing techniques or methods. The result of the inconsistency may be to obscure the historic or aesthetic connection between the elements within the asset and possibly to affect the

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<sup>39</sup> See *Thatching Decision: Tree Guidance Note* English Heritage (2009)

evidential value of the asset as a whole. It may be possible to bring consistency through a heritage partnership agreement if the whole or a large part is in single ownership or management.

97. The spaces between the buildings within an area asset can be important and may be consciously designed, such as a market square, have developed over a period of time, such as parkland surrounding a country house, church, home farm and estate village, or simply be the space between similar assets with some other link such as a variety of earthworks on downland. Restoration of individual elements within a group of assets is more likely to be successful in terms of the group if the effect on the other assets has been considered from the first. Restoration of a known designed space is more likely to meet the PPS criteria especially if there is considerable public benefit. One example might be the re-creation of open streets to an earlier pattern following the removal of a post World War II monolithic shopping centre. Where it can be shown that the restoration not only improves the appreciation of the space itself but also the settings of the assets that are linked to the space, the case for restoration is stronger.

98. For **marine sites**, repair and restoration for wreck structures are unlikely to form a significant part of their management but stabilisation and erosion protection strategies may be appropriate to sustain their integrity. Heritage Partnership Agreements may also be of assistance to ensure the long term future of the site is understood and, so far as is practicable, managed in the best interest of its conservation.

## ***Addition and Alteration***

### **General points**

99. The join between new work and the existing fabric needs particular attention, both for its impact on the significance of the existing asset and the impact on the contribution of its setting. New openings being created in an existing asset will need careful consideration, particularly of the architectural and historic significance of the area being disturbed. Where new work or additions lead to elements with significance becoming redundant, it may be better to leave features, such as doors or decorative features, in situ where their removal would have an adverse effect, say, on the asset's aesthetic, historic or evidential value.

100. **Landscapes** will usually have varying degrees sensitivity to change within the overall asset and a skilled designer is likely to be able to identify these and incorporate new elements in these areas in ways that will enhance the asset's significance. Some landscapes will be so sensitive that the degree of alteration or addition possible without loss of significance may be very limited. This may be particularly true of landscapes with consistent archaeological interest.

101. Alterations or additions to **buildings** by the insertion of new elements such as dormers and roof lights to bring roof spaces into more intensive use can be justified where the significance is not materially affected. In the case of roof lights this might be by locating them on less prominent roof slopes. If consent is given for additional features, echoing the style of existing ones, it is important that their design, scale, proportion and location is sympathetic to the character of the building and the detailing is appropriate. In the case of windows, for example, care is required to see that the details of the design, including the overall proportions, the thickness and moulding of



glazing bars and the size and arrangement of panes, are appropriate to the date of the building or to the date when the window aperture was made.

102. The introduction of new floors into a building may have a considerable impact on its significance and justification may be needed. Certain asset types, like large industrial buildings, are generally more capable of accepting such changes without loss of significance than others.

103. Many flooring materials are not only likely to be of interest in themselves, but particular care is needed on ground floors to ensure the archaeological interest is not adversely affected by proposed works.

104. For **standing remains**, **buried remains** and **marine sites**, new work and alterations are likely to be rare. There may be cases where a new structure attached to, or immediately adjacent to an asset provides a viable financial basis for the long-term care of the original asset and the authority will need to balance the those benefits against any harm to the significance. There may be cases where interpretation and conservation require additions to be made to the remains, or cases where alterations may assist the long-term conservation of the remains. Works other than those of a minor nature are likely to be acceptable only in exceptional circumstances where they would be in the best long-term interests of the conservation of the remains or there are other planning justifications that accord with the general principles.

## ***For Research***

105. An archaeological investigation involving intrusive works to an asset may be proposed as a stand-alone project and not merely as an exercise in investigating an asset that will be lost or altered for other reasons. There will be a public benefit gained if the investigation results in an increased understanding of our past. To maximise the prospects for the investigation it must be well planned and executed. Guidance on how to secure the best results from an investigation is set out in paragraphs 57 to 64 above<sup>40</sup>.

106. Any intrusive archaeological investigation will harm the significance of an asset. It will at least impair the quality of a future archaeological investigation. It may also affect the historic and aesthetic values of the asset. Factors worthy of consideration when looking at the balance of the public benefit from the investigation and that loss of significance include:

- whether at least part of the investigation can be achieved using non-destructive techniques;
- whether the historical understanding sought could be found elsewhere, perhaps from another site whose destruction is inevitable;
- the likelihood of the investigation yielding valuable evidence of our past; and,
- the predicted rate of environmental decay of the asset.

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<sup>40</sup> See *Understanding Historic Buildings: Policy and Guidance for Local Planning Authorities*, English Heritage (2008)